

ALABAMA PUBLIC SERVICE COMMISSION

COUNTY OF Fulton  
STATE OF Georgia

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Milton McElroy, Jr. who being by me first duly sworn deposed and said that he/she is appearing as a witness on behalf of BellSouth Telecommunications, Inc. before the Alabama Public Service Commission in Docket No. 29054, IN RE: Implementation of the Federal Communications Commission's Triennial Review Order (Phase II – Local Switching for Mass Market Customers), and if present before the Commission and duly sworn, his/her statements would be set forth in the annexed direct testimony consisting of 23 pages and 2 exhibits.

Milton McElroy Jr.  
Milton McElroy

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 19th DAY OF JANUARY, 2004

Linda M. Taylor

Notary Public



Notary Public, Gwinnett County, Georgia  
Commission Expires March 17, 2007

1                   BELLSOUTH TELECOMMUNICATIONS, INC.  
2                   DIRECT TESTIMONY OF MILTON MCELROY JR.  
3                   BEFORE THE ALABAMA PUBLIC SERVICE COMMISSION  
4                   DOCKET NO. 29054 (PHASE II)  
5                   JANUARY 20, 2004  
6  
7

8    Q.    PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR  
9           POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.  
10          ("BELLSOUTH").  
11

12   A.    My name is Milton McElroy Jr. My business address is 675 West Peachtree  
13          Street, Atlanta, Georgia 30375. My title is Director – Interconnection Services.  
14

15   Q.    PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE WITH  
16          BELLSOUTH.  
17

18   A.    I have over fifteen years experience in the telecommunications industry. My  
19          experience includes various engineering, operations and staff assignments at  
20          BellSouth. I earned a Bachelor of Science degree from Clemson University in  
21          Civil Engineering in 1988 and a Master's degree in Business Administration from  
22          Emory University in 2001. Additionally, I am a registered Professional Engineer  
23          in Alabama, North Carolina, and South Carolina.  
24

25   Q.    WHAT IS THE PURPOSE OF YOUR TESTIMONY?

1  
2 A. The purpose of my testimony is to demonstrate that BellSouth's Bulk Migration  
3 Process of Unbundled Network Element Platform ("UNE-P") service to unbundled  
4 loop ("UNE-L") service is both seamless and effective. To corroborate this fact,  
5 BellSouth engaged PricewaterhouseCoopers ("PwC") to provide an attestation  
6 on the effectiveness of BellSouth's batch process. PwC's work was twofold: first,  
7 PwC observed a test of the Bulk Migration Process using a pseudo Competitive  
8 Local Exchange Carrier ("CLEC"); second, PwC observed a number of live UNE-  
9 L migrations or hot cuts in several states. The test corroborates the testimony of  
10 BellSouth's witness, Mr. Ken Ainsworth, that BellSouth provides a proven,  
11 seamless, high quality individual hot cut process to handle the UNE-L volumes  
12 that would likely result if BellSouth were to obtain full relief from unbundled circuit  
13 switching; and that BellSouth provides a batch hot cut process that offers  
14 additional ordering and provisioning efficiencies to enhance the same proven,  
15 seamless, quality migrations that are currently associated with individual hot cuts.  
16 This process will sufficiently support the batch conversion of a CLEC's  
17 embedded UNE-P customer base to UNE-L services.

18  
19 Q. WHY DID BELL SOUTH ENGAGE PwC TO TEST ITS BULK MIGRATION  
20 PROCESS?

21  
22 A. BellSouth introduced its batch migration process to the CLEC community in  
23 March 2003. Despite their expressed interest in having such a process, not a  
24 single CLEC took advantage of it in the months following its introduction.  
25 Therefore, BellSouth had no significant commercial data with which to

1 demonstrate the efficiency and viability of the Bulk Migration Process other than  
2 the extensive performance data demonstrating the effectiveness of its individual  
3 hot cut process. For this reason, BellSouth engaged PwC to perform an  
4 independent third party test. BellSouth selected PwC because of the Alabama  
5 Public Service Commission's ("Commission's") familiarity with PwC's work  
6 resulting from the regionality testing PwC conducted as part of BellSouth's 271-  
7 approval process. This Commission, along with the Federal Communications  
8 Commission ("FCC"), relied upon PwC's objective and professional findings as  
9 part of its 271 decision.  
10

11 Q. WHAT TYPE OF TEST DID PwC CONDUCT?

12  
13 A. After discussions with PwC about the testing concept, BellSouth engaged the  
14 firm to conduct an attestation examination whereby PwC would examine two  
15 BellSouth assertions concerning its Bulk Migration Process. PwC conducted the  
16 examination in accordance with "attestation standards" established by the  
17 American Institute of Certified Public Accountants ("AICPA"). An "attestation  
18 engagement" occurs when a practitioner, such as PwC, is engaged to issue a  
19 written statement as to whether or not the written assertion of another party, such  
20 as BellSouth, is reliable. Under the AICPA attestation standards, a statement  
21 resulting from such an examination is the highest level of assurance that can be  
22 provided on an assertion and, if positive, results in an opinion by the practitioner,  
23 PwC, that the original assertions have been found to be fairly and accurately  
24 stated in all material respects. To put this in more simple terms applicable to this  
25 test, BellSouth made two claims (assertions) and PwC validated the claims with

1 the opinion that they express in their report (Report of Independent Accountants).

2  
3 Q. WHAT WERE BELLSouth'S ASSERTIONS?

4  
5 A. BellSouth's assertions, as well as the PwC opinions, can be found in Attachment  
6 MM1, BellSouth Telecommunications Inc.'s Report on the BellSouth Bulk  
7 Migration and Regional Tests, December 22, 2003. This attachment contains a  
8 collection of reports as well as a description of the Bulk Migration Test. The  
9 outline of the report package can be found on the Table of Contents page. The  
10 outline of the report is as follows:  
11

12 I. **Report of Independent Accountants for BellSouth**  
13 **Telecommunication's Bulk Migration Process**—this report was issued by  
14 PwC after they observed the bulk migration test associated with BellSouth's first  
15 assertion. They concluded and opined that the Bulk Migration Process would  
16 enable a CLEC to bulk migrate its customer base from UNE-P to UNE-L. PwC  
17 found a few deviations which can be seen on the following page of the report  
18 titled Attachment A and which will be discussed later.  
19

20 II. **Management Assertions on BellSouth Telecommunication's Bulk**  
21 **Migration Process**—this report is BellSouth's first assertion. PwC validated this  
22 assertion with their Report of Independent Accountants in section I. The same  
23 list of deviations is provided in Attachment B of the report to the BellSouth  
24 Assertion on Bulk Migrations.  
25

26 III. **Report of Independent Accountants for BellSouth**  
27 **Telecommunication's Hot Cut Process**—PwC issued this report after the firm  
28 observed hot cuts across the BellSouth region for the second BellSouth  
29 assertion. They concluded and opined that the hot cut provisioning process is  
30 the same when using the Bulk Migration Process or when using the single order  
31 migration process across the BellSouth region. PwC found a few deviations  
32 which can be seen in Attachment C of the report and which will be discussed  
33 later.  
34

35 IV. **Management Assertions on BellSouth Telecommunication's Hot Cut**  
36 **Process**—this report is BellSouth's second assertion. PwC validated this  
37 assertion with their Report of Independent Accountants in section III. The same

list of deviations is provided in Attachment D of the report to the BellSouth Assertion on the Regional Test.

## **Supplementary Information**

### **V. Executive Overview**

#### **A. Overview of Reports**

#### **B. Objective of Supplementary Test Information**

### **VI. Bulk Migration and Regional Test**

### **VII. Glossary of Terms**

Sections V, VI, and VII of the report provide an overview of the assertions and a description of the test that was conducted in Florida along with a description of the live hot cut testing across the BellSouth region.

BellSouth made two assertions. First, BellSouth asserted that its Bulk Migration Process enables a CLEC to migrate multiple end-users from UNE-P service to UNE-L service. In order to facilitate the test, BellSouth created a pseudo-CLEC. Use of the pseudo-CLEC is an established methodology that has been utilized in other process tests. The pseudo-CLEC was established and operated similar to the methodology engaged during the 271 Third Party Tests that were conducted in Florida and Georgia. The pseudo-CLEC submitted multiple bulk order requests following the written procedures provided to the CLECs on the website. Details about BellSouth's batch hot cut process can be found on-line at <http://www.interconnection.bellsouth.com/guides/unedocs/BulkManpkg.pdf>.

The PwC examination of the Bulk Migration Process included a review of all the process steps. PwC began with a review of the project notification that would be submitted by the CLEC, and then reviewed the associated activities of the BellSouth Project Manager. Once all the preordering type of activities was

1 completed, PwC reviewed the activities associated with the ordering process.  
2 They observed the pseudo-CLEC submissions and the activities associated with  
3 BellSouth's ordering systems and the Local Carrier Service Center ("LCSC").  
4 Next, PwC reviewed the traditional provisioning processes including those of  
5 BellSouth's Customer Wholesale Interconnection Network Services Center  
6 ("CWINS") as well as BellSouth Central Office and Field Technicians. The  
7 review of these processes for BellSouth's first assertion was very comprehensive  
8 as evidenced by the quantity of time and number of individuals utilized by PwC in  
9 testing .  
10

11 Second, BellSouth asserted that the Bulk Migration Process requires central  
12 office and field technicians to physically perform the hot cut process. This hot cut  
13 process is the very same process used for non-bulk or individual hot cuts in  
14 BellSouth's nine-state region. In spite of the multiple hot cut offerings, the act of  
15 performing a hot cut remains a simple, straightforward task – and one that  
16 BellSouth performs at high volumes with a high degree of accuracy and speed.  
17 Therefore, BellSouth made the assertion that the hot cut process is used for both  
18 bulk hot cuts as well as individual hot cuts across the region served by BellSouth.  
19 PwC validated the process used across BellSouth's region by observing central  
20 office and field forces using the same hot cut process described in BellSouth's  
21 second assertion in Attachment MM1.  
22

23 Q. WHAT DID PwC USE AS CRITERIA FOR DETERMINING DEVIATIONS AS  
24 THEY VALIDATED THE TWO BELL SOUTH ASSERTIONS?  
25

1 A. PwC expresses their threshold for deviation reporting in the affidavit of Mr. Paul  
2 M. Gaynor of PwC, which can be seen in Attachment MM2. The affidavit was  
3 prepared to provide additional detail for the types of testing procedures used by  
4 PwC during the attestation examinations. It also provides criteria for the  
5 threshold testing beginning with paragraph 10, on page 6 of Attachment MM2.  
6 Their threshold or criteria transcends into three categories:

- 7
- 8 1. Adherence to each process step in excess of 95% of the time.
- 9 2. Any impact to customer service that exceeded 15 minutes.
- 10 3. Any observation that actually met the first two criteria, but PwC  
11 determined that the action (i.e., a particular process step) was critical, thus  
12 it should be reported anyway.
- 13

14 These categories of criteria will be further explored as each deviation is  
15 described and addressed.

16

17 **BellSouth's First Assertion**

18 Q. HOW DID BELL SOUTH ESTABLISH THE PSEUDO-CLEC FOR THE FIRST  
19 ASSERTION OF THE TEST?

20

21 A. BellSouth created the pseudo-CLEC by establishing approximately 750 UNE-P  
22 accounts in three (3) wire centers in Florida for the test. Florida was chosen as  
23 the test location because it has the highest number of embedded UNE-P  
24 customers and it was projected to be the first state to experience extensive  
25 CLEC utilization of the Bulk Migration Process. BellSouth designed the test bed



1 to mirror actual facility distribution and the makeup of existing UNE-P accounts.  
2 BellSouth wanted to ensure that the outside plant facilities assigned to the test  
3 bed circuits would mirror the actual distribution of facilities within the state. An  
4 evaluation of Florida's existing facility usage revealed that approximately 50% of  
5 circuits were served by copper facilities, 14% were served by Universal Digital  
6 Loop Carrier ("UDLC") and 36% were served by Integrated Digital Loop Carrier  
7 ("IDLC"). BellSouth wanted its test bed to reflect the actual make-up of existing  
8 UNE-P accounts in terms of service type or class of service. BellSouth obtained  
9 and analyzed the data associated with establishment of UNE-P service for actual  
10 customers. The data indicated that the test bed should consist of 85% residential  
11 accounts, 10% business, 3% coin, and 2% Remote Call Forwarding ("RCF").  
12 The latter class of service was further broken down into residential and business  
13 RCF products. These classes of service are consistent with the UNE-P  
14 requirements listed on page 9 of the Bulk Migration Process CLEC Information  
15 Package that can be found on-line at

16 <http://www.interconnection.bellsouth.com/guides/unedocs/BulkManpkg.pdf>.

17  
18 Next, BellSouth simulated a CLEC switch by wiring from the originating  
19 equipment ("OE") block on the BellSouth frame in each central office to the CLEC  
20 Connecting Facility Assignment ("CFA") block to establish dial tone for the  
21 pseudo-CLEC switch. This methodology was employed for accounts containing  
22 telephone numbers ("TNs") served by copper and UDLC facilities. IDLC facilities  
23 do not have a physical appearance on the BellSouth frame so a second set of  
24 TNs was established and wired as described above. This second set of TNs was  
25 mapped to the TNs served by IDLC to enable all normal conversion activities to

1 occur. This approach also allowed for the conversion from IDLC to copper or  
2 UDLC facilities during the test.

3  
4 There was one step in the provisioning process that BellSouth was not able to  
5 complete. Because the CLEC switch was simulated, BellSouth could not send  
6 any messages to the Network Portability Administration Center ("NPAC"), which  
7 cause the number port to occur. In other words, BellSouth could not actually  
8 move the UNE-P TN from the BellSouth switch to the CLEC switch because in  
9 the simulated environment, there was no CLEC switch. The absence of this step  
10 did not materially impact the testing of BellSouth's Bulk Migration Process since  
11 the CLEC itself initiates and largely controls the routing change associated with  
12 moving the circuit from BellSouth's switch to its own. All other BellSouth and  
13 CLEC ordering and provisioning procedural steps were followed, completed, and  
14 observed by PwC during the course of the test.

15  
16 Q. HOW MANY AND WHAT TYPES OF BULK MIGRATION HOT CUTS DID  
17 BELL SOUTH PERFORM TO CONFIRM THE FIRST ASSERTION OF THE  
18 TEST?

19  
20 A. BellSouth reviewed its existing base of UNE-L accounts to determine the actual  
21 class of service make-up. The analysis indicated that approximately 87% of  
22 actual UNE-L migrations were for Service Level One ("SL1") voice grade loops  
23 while 7% of the UNE-L migrations were for Service Level Two ("SL2") voice  
24 grade loops. The remaining 6% were distributed across the other designed and  
25 non-designed UNE-L classes of service. This data, combined with the list of

1 classes of service to which UNE-Ps may migrate, guided BellSouth in issuing  
2 migration orders that were distributed based on the embedded base, yet covered  
3 all “migration-permissible” loop types. A list of loop types to which UNE-Ps may  
4 be migrated is found on page 9 of the Bulk Migration Process CLEC Information  
5 Package. The test included both central office and field cuts. As previously  
6 indicated, since 85% of the embedded base of UNE-P accounts consists of  
7 residential classes of service, most of the hot cuts were ordered as non-  
8 coordinated. The test was structured and conducted as follows:

- 9  
10 ○ Day 1 of Testing on December 2, 2003—West Hollywood Central  
11 Office (total of 125 Hot Cuts)  
12 The first day of testing was based upon four Bulk Migration Project  
13 Notifications or Bulk Order Project Identifiers (“BOPIs”). These four  
14 (4) BOPIs accounted for 124 migrations using the Bulk Migration  
15 Process and an additional migration was conducted via the  
16 submission of single Local Service Requests (“LSRs”). The end  
17 result was that there were a total of 125 hot cuts on the first day of  
18 testing.  
19
- 20 ○ Day 2 of Testing on December 4, 2003—Arch Creek Central Office  
21 (total of 125 Hot Cuts)  
22 The second day of testing was based upon six (6) BOPIs. These  
23 six (6) BOPIs accounted for 119 bulk migrations, and six (6) single  
24 migrations were included to reach the test target of 125 hot cuts.  
25
- 26 ○ Day 3 of Testing on December 5, 2003—Perrine Central Office  
27 (total of 125 Hot Cuts)  
28 The third day of testing was based upon three (3) BOPIs. These  
29 three (3) BOPIs accounted for 108 bulk migrations and 17 single  
30 migrations were included to reach the test target of 125 hot cuts.  
31
- 32 ○ Day 4 of Testing on December 11, 2003—West Hollywood, Arch  
33 Creek and Perrine Central Offices (total of 383 Hot Cuts)  
34 The fourth day of testing was based upon a total of five (5) BOPIs  
35 for West Hollywood, three (3) BOPIs for Arch Creek, and seven (7)  
36 BOPIs for Perrine. The 5 BOPIs in West Hollywood accounted for  
37 125 bulk migrations. Additionally, there were two (2) single  
38 migrations in West Hollywood for a total of 127 hot cuts. The three  
39 (3) BOPIs in Arch Creek accounted for 126 bulk migrations, and

1                   there were also five (5) single migrations in Arch Creek for a total of  
2                   131 hot cuts. The seven (7) BOPIs in Perrine accounted for 122  
3                   bulk migrations and three (3) additional single migrations, which  
4                   resulted in a total of 125 hot cuts.

5  
6           The target number of bulk migrations for each of the first three (3) test dates was  
7           125, while the fourth date was designed to test simultaneous provisioning in all  
8           three (3) central offices. The end result was that BellSouth completed a total of  
9           over 375 migrations on the fourth date. Therefore, over 750 hot cut migrations  
10          occurred across the four days of testing with 724 of those resulting from bulk  
11          migration service requests. Coincidentally, since the inception of the test,  
12          BellSouth has had the opportunity to migrate more than 125 UNE-P accounts for  
13          an actual large CLEC that operates in Florida. The testimony of Mr. Ken  
14          Ainsworth will further address the outcomes of this effort.

15  
16   Q.     PLEASE DISCUSS THE FINDINGS FROM THE TEST ON THE FIRST  
17           ASSERTION.

18  
19   A.     PwC validated Bellsouth's first assertion by observing bulk migration hot cuts.  
20           The details of PwC's findings can be found in their Report of Independent  
21           Accountants in Attachment MM1. In summary, PwC observed a total of 724 bulk  
22           hot cuts during the four days of bulk migration testing. In PwC's Report of  
23           Independent Accounts for the first assertion, they provided a positive  
24           confirmation of BellSouth's first assertion with the qualification of some  
25           deviations. These deviations require further review and explanation; however, it  
26           is important to keep the deviations and their impact in an appropriate context.  
27           PwC observed 724 bulk hot cuts during the four (4) test days. The following

1 paragraphs provide an explanation of the deviations found in testing BellSouth's  
2 first assertion and its impact to the customer:

3  
4 First Assertion, Deviation 1—this deviation resulted when the BellSouth  
5 technician could not ANAC (Automatic Number Announcing Circuit) the  
6 BellSouth dial tone prior to the cut for three (3) of the 724 bulk migrations. ANAC  
7 is a capability allowing a technician to plug a test set onto a given loop, dial a  
8 special code and have played out audibly the telephone number currently  
9 assigned to that loop. After investigating and resolving the issue, which took  
10 approximately 40 minutes for each dial tone, the technician was able to restore  
11 the dial tone through the BellSouth switch. The hot cut was then successfully  
12 completed. Although both BellSouth and CLECs strive for perfection,  
13 occasionally there may be an issue with the dial tone from either switch on the  
14 day of the hot cut. Therefore, it is imperative that BellSouth have procedures in  
15 place to resolve these types of issues. These three (3) cuts demonstrate that  
16 BellSouth does have the procedures and ability to resolve issues, and complete  
17 successful migrations. PwC listed this as a category 2 deviation where customer  
18 service was impacted for over 15 minutes.

19  
20 First Assertion, Deviation 2—this deviation resulted after PwC observed 3 of the  
21 724 bulk migrations that took longer than 15 minutes. There was one (1) hot cut  
22 that took 20 minutes while two (2) other hot cuts took approximately 40 minutes.  
23 In these cases, the BellSouth field technician encountered and resolved an issue  
24 involving an electronic cross-connect in a remote terminal. This situation  
25 extended the hot cut's completion time by a few minutes. PwC listed this as a

1 category 2 deviation where customer service was impacted for over 15 minutes.

2  
3 First Assertion, Deviation 3—there were two (2) of the 724 bulk migrations where  
4 BellSouth technicians failed to successfully complete hot cuts. In the first case,  
5 BellSouth performed the migration prior to the due date so the end user customer  
6 would have been able to make calls, but not receive calls. The second case  
7 resulted from the migration not being performed on the due date. In this case,  
8 the end user customer could have potentially lost service. BellSouth has a  
9 thorough process that provides for contingencies to ensure that the risk of  
10 interruption of service to the customer is minimized, but occasionally failures do  
11 occur as demonstrated in the test. PwC listed this as a category 2 deviation  
12 where customer service was impacted for over 15 minutes.

13  
14 These first three (3) deviations constitute PwC findings for the impact to  
15 customer service that exceeded 15 minutes. There were a total of eight (8)  
16 instances during the 724 bulk migrations. The genesis of this 15 minute  
17 benchmark is the Service Quality Measurement (“SQM”) on the timeliness of  
18 coordinated conversions where this Commission has established a benchmark of  
19 95% within 15 minutes. Thus, BellSouth’s performance during the test translates  
20 to 98.9%, which exceeds the Commissions benchmark.

21  
22 First Assertion, Deviation 4—this deviation resulted when BellSouth field  
23 technicians were completing IDLC conversions in a field remote terminal. The  
24 technician was unable to ANAC the BellSouth dial tone for 19 lines. This issue or  
25 deviation was an artifact of the test resulting from the two (2) TNs needed for all

1 IDLC served UNE-Ps. In live customer conversions, only one (1) TN is involved,  
2 thus this situation would not have occurred. This deviation did not have any  
3 negative impact to the migration; the 19 hot cuts were still successfully  
4 completed within the allotted 15 minute time period. PwC listed this as a  
5 category 3 deviation where the issue would not be considered reportable via the  
6 first two (2) threshold categories, but PwC elected to report the issue as a  
7 deviation to ensure that it was visible to the reader.

8  
9 First Assertion, Deviation 5—this deviation resulted when the central office  
10 technician did not completely follow the process for one (1) of the 724 bulk hot  
11 cuts. In this case, the technician found that the BellSouth jumper wire had the  
12 wrong TN, but the CLEC jumper wire had the correct TN. The technician should  
13 have contacted the CWINS center, which would have contacted the CLEC to  
14 confirm the TN and obtain the CLEC's permission to proceed with the cut. These  
15 contacts did not occur. In the end, the hot cut was successfully made with the  
16 correct TN, but the deviation was noted due to a process step miss. PwC listed  
17 this as a category 3 deviation where the issue would not be considered  
18 reportable via the first two (2) threshold categories, but PwC elected to report the  
19 issue as a deviation to ensure that it was visible to the reader.

20  
21 First Assertion, Deviation 6—this deviation resulted when PwC observed a total  
22 of six (6) instances in which BellSouth technicians missed a hot cut process step.  
23 More specifically, on Day 2 of the test, PwC observed that the BellSouth  
24 technician neglected to test the CLEC dial tone prior to performing the hot cut for  
25 six (6) telephone numbers. These were certainly process step omissions;

1       however, the process contains several safeguards to ensure that the hot cuts are  
2       successfully executed. That was the case on these six (6) observations; these  
3       inadvertent step omissions did not negatively impact the ultimate success of all  
4       six (6) of the conversions. PwC listed this as a category 3 deviation where the  
5       issue would not be considered reportable via the first two (2) threshold  
6       categories, but PwC elected to report the issue as a deviation to ensure that it  
7       was visible to the reader.

8  
9       First Assertion, Deviation 7—this deviation resulted when a minor system issue  
10      was identified during the test while submitting bulk LSRs. The issue is not  
11      considered material since no CLEC has actually bulk ordered the associated  
12      products. The Bulk Migration test included an evaluation of the electronic LSR  
13      submission process. Using this process, the pseudo-CLEC successfully  
14      submitted LSRs resulting in BellSouth's ordering systems generating 724 bulk  
15      migrations. There are two circumstances under which a bulk LSR cannot be  
16      submitted into BellSouth's ordering systems. The first circumstance involves the  
17      bulk migration to a UNE-L service known as a non-designed 2-Wire Unbundled  
18      Copper Loop or UCL-ND. The second circumstance involves the bulk migration  
19      of Remote Call Forwarding UNE-P services. BellSouth can in fact perform  
20      migrations for both of these service types via single migration; however, the  
21      Universal Service Order Codes ("USOCs") associated with these products  
22      cannot be submitted on bulk LSRs. If a CLEC needed to order the migration of  
23      either of these products, it would simply submit single LSRs. It should be  
24      emphasized that these two (2) products constitute less than 2% of the service  
25      types within BellSouth's embedded base of services. Therefore, this particular



1 issue would have minimal impact on CLEC customers and is not material to  
2 BellSouth's overall ability to successfully perform bulk migrations of services  
3 commonly used by CLECs. BellSouth has targeted the UCL-ND issue correction  
4 to occur in Release 15.0 in March of 2004, while the RCF issue is currently under  
5 investigation. RCF is a unique product that does not have an actual loop in the  
6 service. BellSouth is considering the removal of this product from the Bulk  
7 Migration Process since it is targeted for the migration of services that involve  
8 loops. Once again, it is important to put the magnitude of this system issue into  
9 context particularly since no CLECs have attempted to bulk order migrate these  
10 two service types. PwC listed this as a category 1 deviation where adherence to  
11 the process did not occur at least 95% of the time. If you consider the embedded  
12 base of these products and the fact that no CLEC has ever ordered the products  
13 via the Bulk Migration Process, clearly there is no material impact to operational  
14 CLECs.

15  
16 First Assertion, Deviation 8—this deviation resulted due to poor performance  
17 observed on the first day of testing with BellSouth's Enhanced Delivery Initiative  
18 ("ENDI") system. For non-coordinated hot cuts, this system sends an electronic  
19 notification (commonly called a "go ahead") to inform the CLEC that BellSouth  
20 has completed the hot cut. This notification is the signal for the CLEC to begin  
21 their porting process with NPAC. BellSouth witness, Mr. Ken Ainsworth, provides  
22 a detailed description of this system in his testimony. During the first day of  
23 testing, ENDI experienced an issue with a corrupt downstream server. There  
24 were two (2) servers that should have been submitting the notices to the pseudo-  
25 CLEC. The corrupted server was not sending messages, thus the failure

1 occurred and the deviation was noted. BellSouth corrected the server problem  
2 on December 3, 2003. As is evidenced by PwC's observations, the system was  
3 fixed and no failures were observed on the second and third days of testing.  
4 There was one (1) notice for a two-line service order that was not submitted on  
5 day four of testing. This failure resulted from an issue of completing the work  
6 order step in ENDI, which prevented the notice from being submitted. The  
7 problem was identified and corrected as evidenced by the test results on the  
8 second, third, and fourth days of testing. PwC listed this as a category 1  
9 deviation where adherence to the process did not occur at least 95% of the time.  
10 When considering the first day of testing, BellSouth failed to return 47 of the 124  
11 bulk migration notifications. However, once the server problem was corrected,  
12 BellSouth successfully submitted 119 notices on the second day, 108 notices on  
13 the third day, and 371 notices on the fourth day of testing. In other words,  
14 BellSouth's performance was 99.7% after the issue was resolved from the first  
15 day of testing.

16  
17 After considering the materiality of the deviations noted by PwC in their report, it  
18 is clear that BellSouth's first assertion has been validated. PwC ultimately found  
19 that this test validated the sufficiency of BellSouth's Bulk Migration Process and  
20 the results provide quantifiable proof that BellSouth's process is effective in  
21 allowing CLECs to migrate large numbers of their customers from UNE-P to a  
22 variety of UNE-L services.

23  
24 To further support this finding, BellSouth would note that its hot cut process was  
25 also tested by KPMG (now known as BearingPoint) most recently during the

1 Florida Third Party Test. KPMG first conducted a detailed review of BellSouth's  
2 methods and procedures documents that governed hot cuts. Next, like PwC,  
3 KPMG then physically observed BellSouth technicians as they performed actual  
4 hot cuts. Their finding was the same as PwC's; namely, that BellSouth  
5 technicians provisioned the hot cuts in accordance with documented methods  
6 and procedures. KPMG took their analysis a step further by also assessing  
7 BellSouth's performance from a SQM perspective. There were test points or  
8 evaluation criteria used to determine how well BellSouth met the SQM objectives  
9 for hot cut completions. KPMG gave a satisfactory rating to each of the  
10 evaluation criteria, a clear endorsement of BellSouth's documented hot cut  
11 process and its ability to successfully follow it. In addition to the findings of PwC  
12 and KPMG, both this Commission and the FCC likewise confirmed the  
13 effectiveness of BellSouth's hot cut process during BellSouth's Section 271  
14 Application approval process. Finally, this Commission, along with eight (8) other  
15 state commissions and the FCC, have each independently found that BellSouth's  
16 hot cut process is nondiscriminatory, timely, accurate, and effective.

17  
18 **BellSouth's Second Assertion**

19 Q. WHY DID BELLSOUTH MAKE THE SECOND ASSERTION?

20  
21 A. BellSouth made the second assertion to provide proof that the Bulk Migration  
22 Process applies ubiquitously across the BellSouth region.  
23

1 Q. DOES PwC'S CONFIRMATION OF THE SECOND ASSERTION PROVIDE  
2 PROOF THAT THE PROVISIONING PORTION OF BELL SOUTH'S HOT CUT  
3 PROCESSES ARE THE SAME REGION-WIDE?  
4

5 A. Yes. In order to verify the validity of the second assertion, PwC observed live hot  
6 cuts across the region served by BellSouth. PwC employed sampling techniques  
7 as described beginning in paragraph 34 of Attachment MM2 to determine the  
8 sample size of observations needed for the BellSouth region. PwC was able to  
9 observe sufficient order volume in seven (7) of the states served by BellSouth.  
10 They were unable to obtain sufficient volume in Alabama or Kentucky, although  
11 that does not alter the fact that the same hot cut process is utilized across all  
12 nine (9) states. Beginning in paragraph 39 of Attachment MM2, PwC described  
13 the processes that they observed. They concluded that these same processes  
14 were in use across all the states in the BellSouth region. Based upon these  
15 observations, PwC's testing leads to the conclusion that the same UNE-L hot cut  
16 process applies in each of BellSouth's states. Thus, Bulk Migration Process and  
17 its proven success in enabling a CLEC to migrate customers in a bulk fashion is  
18 applicable to all the states within the BellSouth region.  
19

20 Q. DID PwC LIST ANY DEVIATIONS DURING THEIR EVALUATION OF THE  
21 REGIONALITY ASSERTION?  
22

23 A. Yes, similar to the first assertion, PwC did identify and list a few items that it titled  
24 deviations. Again, it is important to look at the total context of their live hot cut  
25 testing to put their observations in perspective. PwC observed 96 live hot cut

1 service orders for a total of 179 migrations to test BellSouth's regionality  
2 assertion. Out of 179 hot cuts, it is important to note that all 179 hot cuts were  
3 successfully completed.

4  
5 In Attachment C to their Report of Independent Accountants for the second  
6 assertion, which is contained in Attachment MM1, PwC listed the deviations that  
7 they observed. The first six (6) deviations are the same deviations cited for the  
8 first assertion. PwC elected to place deviations to the actual hot cut process  
9 itself in both reports. The deviation explanations will not be repeated. The  
10 following paragraphs provide an explanation of the deviations directly associated  
11 with the second assertion and its impact to the customer.

12  
13 Second Assertion, Deviation 7—this deviation resulted from a simple process  
14 step omission that ultimately had no direct impact on the success of the hot cut.  
15 PwC found a total of nine (9) occasions in which BellSouth technicians  
16 inadvertently omitted either a CLEC or BellSouth pre-hot cut verification step. It  
17 is important to note that the observed process step omissions were not a  
18 regionality issue; they were simply issues of BellSouth technicians not completely  
19 following the same hot cut process that is used across the BellSouth region. In  
20 spite of the omitted step, all nine (9) hot cuts resulted in successful conversions.  
21 PwC listed this as a category 1 deviation where adherence to the process did not  
22 occur at least 95% of the time.

23  
24 Second assertion, Deviation 8—this deviation resulted when there was no  
25 BellSouth dial tone on the day of the cut for one (1) of the 179 hot cuts. In this

1 case, instead of attempting to restore dial tone on the BellSouth side of the cut,  
2 the technician elected to go ahead with the hot cut. The cut was successfully  
3 made, and the CLEC accepted the migration when contacted by the CWINS  
4 center. As stated previously, no dial tone conditions infrequently occur; however,  
5 when it does, BellSouth has procedures in place to resolve these types of issues  
6 and complete a successful migration. PwC listed this as a category 1 deviation  
7 where adherence to the process did not occur at least 95% of the time.

8  
9 Second Assertion, Deviation 9—this deviation was noted after an attempt to  
10 resolve a CLEC issue on one (1) of the 179 hot cuts. When the BellSouth  
11 technician began the hot cut process on the due date, there was no CLEC dial  
12 tone so the technician correctly put the order in a missed appointment status that  
13 returns the responsibility back to the CLEC to resolve the missing dial tone issue.  
14 On the next day, there was an additional hot cut being observed by the same  
15 PwC tester. While the PwC tester was in the central office, the BellSouth  
16 technician checked on the hot cut from the previous day. The CLEC had  
17 corrected their dial tone problem, so the technician completed the hot cut. The  
18 technician should not have made the cut since the service order was still in a  
19 missed appointment status, however. Thus, the hot cut process was not  
20 correctly followed and this observation was listed as a deviation. To further  
21 complicate the story, the CLEC had actually ported the TN on the day prior to the  
22 due date of the hot cut. The bottom line is that the customer could make calls,  
23 but could not receive any calls for two (2) days, and it would have been longer if  
24 the BellSouth technician had not violated the process and completed the hot cut.  
25 PwC listed this as a category 2 deviation where customer service was impacted

1 for over 15 minutes.

2  
3 At the end of this testing period, 100% of the hot cuts were successfully  
4 completed which can be attributed to the numerous checks and balances that  
5 BellSouth has intentionally built into the hot cut process. Because of the  
6 existence of multiple crosschecks, the omission of one step, as observed by  
7 PwC, does not typically derail the actual conversion. Similarly, in these  
8 instances, there was no material impact to the CLEC customer. Again, based  
9 upon the Bulk Migration Test as well as live hot cut observations, PwC confirmed  
10 that BellSouth uses the same hot cut process for individual and bulk hot cuts.  
11 They further confirmed that this same process is used ubiquitously across the  
12 BellSouth region.

13  
14 Q. WOULD YOU SUMMARIZE YOUR TESTIMONY?

15  
16 A. Yes. Through the testing conducted by PwC, BellSouth has demonstrated that  
17 its Bulk Migration Process of UNE-P service to UNE-L service is both seamless  
18 and effective. PwC observed some 724 hot cuts utilizing the Bulk Migration  
19 Process and some 179 live hot cuts in several states. The test corroborates the  
20 testimony of BellSouth's witness, Mr. Ken Ainsworth, that BellSouth provides a  
21 proven, seamless, high quality individual hot cut process to handle the UNE-L  
22 volumes that would likely result if BellSouth were to obtain full relief from  
23 unbundled circuit switching; and that BellSouth provides a batch hot cut process  
24 that offers additional ordering and provisioning efficiencies to enhance the same  
25 proven, seamless, quality migrations that are currently associated with individual

1           hot cuts. This process will sufficiently support the batch conversion of a CLEC's  
2           embedded UNE-P customer base to UNE-L services.

3

4   Q.     DOES THIS CONCLUDE YOUR TESTIMONY?

5

6   A.     Yes.

7